

# MARZEC LAW FIRM, P.C.

DARIUS A. MARZEC IS LICENSED TO PRACTICE LAW IN: NEW YORK  
NEW JERSEY • CONNECTICUT • MASSACHUSETTS • PENNSYLVANIA  
WASHINGTON, D.C. • ILLINOIS • FLORIDA • CALIFORNIA • HAWAII

## NEW YORK OFFICE

776A Manhattan Ave, Room 104  
Brooklyn, NY 11222  
Phone: (718) 609-0303  
Facsimile (718) 841-7508  
dmarzec@marzeclaw.com

---

Via ECF

June 4, 2019

Honorable Lorna G. Schofield  
United States District Judge  
40 Centre Street, Courtroom 1106  
New York, New York 10007

**RE: Wieslawa Zywolewska vs. Darius A. Marzec, et al.**  
**Docket No.: 1:19-cv-01932 (LGS)**

Dear Honorable Judge Schofield:

I just learned about this matter today. I will be representing Defendants Darius A. Marzec and Marzec Law Firm, P.C. This matter involves a former client of the firm. Given previously scheduled matters and deadlines, and because the client file has to be retrieved from storage, I am requesting that Defendants' time to answer or otherwise respond to the Complaint be extended by thirty (30) days. According to the filed affidavits of service, the original due date is June 5, 2019 and the date sought to be extended is the same. The new date proposed to answer or otherwise respond to the Complaint is July 8, 2019, given that thirty (30) days falls on Independence Day and the holiday weekend. Defendants have not previously requested an extension of time to respond to the Complaint or for any other matter.

Defendants' counsel further respectfully requests that the initial pretrial conference set for June 18, 2019 be adjourned to a date after Defendant's time to file responsive pleadings is due given a scheduling conflict and because no conference should take place until Defendants have the opportunity to respond to the Complaint. Moreover, the undersigned counsel never received notice of the June 18, 2019 conference (or any other prior date for a conference). According to the docket, the original date of the initial pretrial conference was April 30, 2019, later moved to June 18, 2019 due to lack of service of the Complaint. Defendants have not previously requested an adjournment of the initial pretrial conference.

The undersigned counsel has reached out to Plaintiff's counsel, Robert Wisniewski, and he consents to the extension of time to respond to the Complaint as well as to the request to adjourn the initial pretrial conference to a date after responsive pleadings are due.

Sincerely,

*Jerome Noll*

Jerome Noll

JN:jn

CC: Robert Wisniewski, Esq.  
Robert Wisniewski, P.C.  
40 Wall Street, Suite 2833  
New York, New York 10005

Encl.: None